

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 18-00102-01-CR-W-GAF
)	
JAMES R. GEEN, JR.,)	
)	
Defendant.)	

MOTION TO EXTEND DEADLINE TO FILE PSR OBJECTIONS

COMES NOW the defendant, James R. Green, Jr., through his counsel, Anita L. Burns, Assistant Federal Public Defender for the Western District of Missouri, and moves this Court to extend the deadline for filing Objections to the PSR until March 18, 2019. The objections are currently due March 11, 2019.

SUGGESTIONS IN SUPPORT

1. On May 1, 2018, an Indictment was filed in the Western District of Missouri charging defendant with violations of 18 U.S.C. §§ 2242(b), 2251(a), (e), and 2252(a)(4).
2. On May 2, 2018, the office of the Federal Public Defender was appointed to represent defendant.
3. On November 20, 2018, defendant pled guilty to counts two and nine of the indictment.
4. Additional time is needed to prepare objections/corrections to the presentence investigation report.

WHEREFORE, the defendant, James R. Green, Jr., respectfully requests this Court extend the deadline for filing Objections to the PSR until March 18, 2019.

Respectfully submitted,

/s/ Anita L. Burns

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CERTIFICATE OF SERVICE

In accordance with Rule 49(a), (b) and (d), Fed. R. Crim. P., and Rule 5(b), Fed. R. Civ. P., it is hereby certified that one copy of the foregoing Motion was electronically filed and that notice of filing was sent to all parties pursuant to the Electronic Case Filing System on this 11th day of March, 2019.

/s/ Anita L. Burns
Anita L. Burns